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Michael David Greenfield (a.k.a. Michael Ben-Ari)*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

MICHAEL DAVID GREENFIELD
a.k.a. MICHAEL BEN-ARI

Debtor in a Foreign Proceeding.

Chapter 15

Case No. 21-11411 (SCC)

**DECLARATION OF ROMAN PELTSMAN IN SUPPORT OF MOTION OF LIOR
DAGAN, THE FOREIGN REPRESENTATIVE, FOR ENTRY OF AN ORDER
AFFIRMING HIS AUTHORITY TO REALIZE AND TAKE CONTROL OF CERTAIN
IDENTIFIED ASSETS OF THE DEBTOR AND ASSETS OF THE DEBTOR THAT MAY
BE IDENTIFIED IN THE FUTURE WITHIN THE UNITED STATES AND
REPATRIATE THOSE ASSETS TO ISRAEL**

I, Roman Peltsman, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am an Associate at Furth, Wilensky, Mizrachi, Knaani - Law Offices (“FWMK”), a law firm based in Tel Aviv, Israel. I have practiced at FWMK since 2020. I hold an L.L.B. from the Hebrew University in Jerusalem. Since 2019, I have been licensed to practice law in the State of Israel. I have extensive experience in insolvency proceedings under Israeli law, including liquidation proceedings, corporate rehabilitations, and creditor settlements.

2. The head of FWMK’s insolvency practice, Advocate Lior Dagan (the “Trustee”), has been appointed by the Tel Aviv-Yafo District Court (the “Israeli Court”) as trustee for Michael David Greenfield (“Greenfield,” a.k.a. Michael David Ben-Ari, or the “Debtor”) and EGFE Israel

Ltd. (the “Company”) and EGFE Hungary KFT (the “Hungarian Company”) in consolidated insolvency proceedings that are currently pending in the Israeli Court (the “Israeli Proceedings”). Mr. Dagan is also the Foreign Representative of Greenfield in this Chapter 15 case. I am a member of a team of FWMK attorneys that are working with Mr. Dagan in connection with insolvency proceedings involving Greenfield and the Company.

3. I submit this declaration (“Declaration”) in support of the Foreign Representative’s motion for entry of an order affirming his authority to realize and take control of certain identified assets of the debtor and assets of the debtor that may be identified in the future within the United States and repatriate those assets to Israel.

4. This Declaration comprises legal opinions and statement of facts.

5. To the extent that matters stated in this Declaration are statements of fact that are within my personal knowledge, they are true. To the extent that matters stated in this Declaration are statements of fact not within my personal knowledge, they are derived from documents and/or information supplied to me by or on behalf of the Trustee or other members of the Trustee’s team and are true to the best of my knowledge, information, and belief.

6. Where the matters stated in this Declaration are statements of legal opinion, such statements represent my view of Israeli law as a practicing lawyer.

7. The Debtor’s interests are promoted through repatriation of the assets to Israel because it will allow consolidation of the disposition of the assets in the situs of the main proceeding, rendering significant efficiencies in litigating the administration and distribution of these assets, rather than through piecemeal, international litigation. In addition, the Debtor is currently represented by an attorney in the Israeli Proceedings.

8. Under the Israeli Insolvency and Economic Rehabilitation Law of 2018 (the

“Insolvency Act”) § 232, all debtor’s creditors are entitled to file a claim for debt owed in Israel. This is irrespective of whether the creditor is an Israeli national or a foreigner. Further to the Insolvency Act § 232, “[t]he debts in each grade in the order of repayment will be repaid to all creditors in the same grade at an equal rate according to their amounts and without any preference.”

9. The Foreign Representative intends to distribute all of Debtor’s assets pro-rata amongst all creditors, irrespective of where in the world they are located.

10. I am not aware of any creditors of the Debtor that have filed or intend to file a claim in the United States.

Dated: March 9, 2022

/s/ Roman Peltsman
Roman Peltsman